

Rocky Flats Environmental Technology Site

1-S27-ADM-02.28

REVISION 0

PRICE-ANDERSON AMENDMENTS ACT PROCESS

APPROVED BY

[Signature]

W. S. Glover

3/30/95

Director,
Performance Assurance

Print Name

Date

Responsible Organization Performance Assurance Effective Date 04/01/95

CONCURRENCE BY THE FOLLOWING DISCIPLINES IS DOCUMENTED IN THE PROCEDURE HISTORY FILE

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Analytical Services
Building Deactivation
Economic Development
Engineering & Safety
Environmental Restoration
General Counsel
Organizational Effectiveness
Performance Assurance
Planning & Integration
SNM Management & Storage
Support Services
Waste Management
Waste Stabilization

SUPPRESSED

USE CATEGORY 4

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1. PURPOSE

This procedure establishes the lead organization for coordinating actions required and the process for the preparation of implementation plans for nuclear safety requirements under the Price-Anderson Amendments Act of 1988, which subjects Department of Energy (DOE) contractors to potential civil fines and criminal penalties for violations of DOE Rules relating to DOE nuclear safety requirements

This procedure implements DOE Standard 1082-94, Preparation, Review, and Approval of Implementation Plans for Nuclear Safety Requirements (dated October 1994)

2. SCOPE

This procedure applies to EG&G Rocky Flats, Inc (Rocky Flats) organizations involved with implementation of nuclear safety requirements or nuclear activities associated with designated nuclear facilities

This procedure addresses the following topics

- Preparation of response to DOE rules published for notice and comment
- Handling rules with immediate implementation
- Preparation of implementation plans for DOE rules
- Review and approval of implementation plans
- DOE rejection of an implementation plan
- Revision of implementation plans
- Preparation of response to DOE enforcement action under 10 CFR 820, Procedural Rules for DOE Nuclear Activities

When DOE issues special instructions regarding the preparation of implementation plans for a specific rule that deviate from DOE Standard 1082-94, the special instructions shall supersede the parts of this procedure from which they deviate

3. OVERVIEW

Under the direction of the Standards Board, Performance Assurance (PA) serves as the coordinating organization for the development of implementation plans called for by DOE nuclear safety requirements and for the preparation of responses required by enforcement action taken under 10 CFR 820. This procedure addresses nuclear safety requirements and nuclear activities associated with designated nuclear facilities, and provides instructions for the uniform and consistent handling of DOE nuclear safety requirements (defined in Section 4, Definitions). This procedure is to be used in conjunction with 1-Q05-ADM-02.26, Standards Identification, Assessment, and Noncompliance Processes.

Pursuant to the Price-Anderson Amendments Act of 1988, the DOE issued 10 CFR 820, Procedural Rules for DOE Nuclear Activities, which defined and specified procedural rules for enforcement of nuclear safety requirements. DOE contractors, subcontractors, and suppliers are subject to fines of up to \$100,000 per day for violations of nuclear safety requirements, and individuals are subject to criminal penalties for willful violations. Positive incentives are provided to contractors in 10 CFR 820 for self-identification of deficiencies, prompt and complete reporting, root cause analysis which addresses deficiencies in programs or processes, and comprehensive corrective action to prevent recurrence.

Some final rules are issued and in effect. DOE is in the process of issuing additional rules which will replace equivalent existing DOE Orders.

As each proposed rule is published for notice and comment, the affected organizations will be given the opportunity to review and comment on the proposed rule. This effort will be coordinated by Performance Assurance and is described in Section 6, Rules Received for Comments.

Some of the 10 CFR rules will not require implementation plan submittals, but simply become effective after their issuance. Efforts to ensure compliance or request exemptions for such rules are described in Section 7, Immediate Implementation.

3. OVERVIEW (continued)

Some of the 10 CFR rules will require the submittal of an implementation plan or other documents within a specific time. These planned rules fall under various site programs with different organizations having primary responsibility. This procedure is intended to provide a consistent set of instructions for handling rules and developing rule implementation plans. This is described in Section 8, Rules Requiring Submittal of an Implementation Plan. Preparation of implementation plans is described in Section 9, Preparation of Implementation Plans.

To provide a consistent sitewide approach, funding for the development of the implementation plan and for implementation of the nuclear safety requirement and the plan by all organizations is the responsibility of the lead technical organization (the responsible organization).

4. DEFINITIONS

The definition of other terms used in Standards Program documents and procedures are included in the Standards Program Manual, Section 3, Glossary of Terms.

Affected Organization. An organization that has not been assigned lead programmatic responsibility for the activity or function under consideration but that has a role in the implementation of the activity or function.

DOE Nuclear Safety Requirements. The set of enforceable rules, regulations, or orders relating to nuclear safety adopted by DOE (or by another Agency if DOE specifically identifies the rule, regulation, or order) to govern the conduct of persons in connection with any DOE nuclear activity, and includes any programs, plans, or other provisions intended to implement these rules, regulations, orders, a Nuclear Statute, or the Act, including technical specifications and operational safety requirements for DOE nuclear facilities. For purposes of the assessment of civil fines, the definition of DOE Nuclear Safety Requirements is limited to those identified in 10 CFR 820.20(b) (10 CFR 820.2, Definitions).

4. **DEFINITIONS (continued)**

Nonreactor Nuclear Facility. Those activities or operations that involve radioactive and/or fissionable materials in such form and quantity that a nuclear hazard potentially exists to the employees or the general public. Incidental use and generating of radioactive materials in a facility operation (e.g., check and calibration sources, use of radioactive sources in research and experimental and analytical laboratory activities, electron microscopes, and X-ray machines) would not ordinarily require the facility to be included in this definition. Transportation of radioactive materials, accelerators and reactors and their operations are not included. The application of any rule to a nonreactor nuclear facility shall be applied using a graded approach, included are activities or operations that

- Produce, process, or store radioactive liquid or solid waste, fissionable materials, or tritium,
- Conduct separations operations,
- Conduct irradiated materials inspection, fuel fabrication, decontamination, or recovery operations,
- Conduct fuel enrichment operations,
- Perform environmental remediation or waste management activities involving radioactive materials, or
- Design, manufacture, or assemble items for use with radioactive materials and/or fissionable materials in such form or quantity that a nuclear hazard potentially exists (10 CFR 830.3, Definitions)

NOTE *The Safety Analysis group can assist in the determination of nuclear activities*

Nuclear Activity. Any activity which directly or indirectly affects a mass of nuclear material greater than that specified in DOE STD-1027-92, Hazard Categorization and Accident Analysis Techniques for Compliance with DOE Order 5480.23, Nuclear Safety Analysis Reports, and which is also required to achieve compliance with any DOE nuclear safety requirement as defined in 10 CFR 820.2

4. **DEFINITIONS (continued)**

NOTE *A list of current nuclear facilities for the site is provided in the Safety Analysis Program Implementation Plan and the Site Safety Analysis Phase I Report, Site Hazards Analysis and Facility Categorization (NSTR-016-94)*

Nuclear Facility. Reactor and nonreactor nuclear facilities. (10 CFR 830.3, Definitions)

Responsible Organization. The organization that has been assigned programmatic lead responsibility for the activity or function under consideration.

5. RESPONSIBILITIES

5.1 Affected Organizations

Support the lead technical organization by providing input to the required submittals.

Review and comment, as appropriate, on proposed rules and implementation plans

Perform compliance assessments and assist in developing rule implementation plans as required.

Perform actions to achieve compliance in accordance with implementation plans

5.2 General Counsel

Reviews and comments, as appropriate, on proposed rules and implementation plans.

Reviews proposed responses to enforcement actions for legal requirements and commitments.

5.3 Performance Assurance (Price-Anderson Program Manager)

Serves as the subject-matter expert and the primary Rocky Flats point of contact for the Price-Anderson Amendments Act, DOE Price-Anderson enforcement, and submittal of DOE rule implementation plans

Identifies nuclear safety requirements (rules) published by DOE in the Federal Register

Notifies the responsible organization when a rule is published and action is required or when other applicable information is received

Provides assistance to responsible or other affected organizations, as requested, in the preparation of implementation plans

Coordinates and assists with the preparation of responses to enforcement actions issued under 10 CFR 820.

5.4 Responsible Organization or Lead Technical Organization (Functional Title)

Budgets for development of implementation plans and for implementation of nuclear safety requirements using the guidelines of Appendix 1, Budget Guidance for Implementation of Nuclear Safety Requirements.

Takes the lead for Rocky Flats with respect to a rule in determining the status of compliance, in preparing the rule implementation plan, and in meeting rule time deadlines and other requirements of the rule

Defines the impact and scope of the rule, and identifies other affected organizations

Provides copies of the rule to affected organizations

Establishes, in conjunction with Performance Assurance, assessment and implementation guidance for the rule, including a schedule for any documents to be submitted to DOE

Utilizes 1-Q05-ADM-02 26, as appropriate, to determine the status of rule compliance, actions necessary to achieve full compliance, and the schedule for these actions

Prepares implementation plan as a single site-level document for submittal to DOE

Prepares and submits updates or revisions to the implementation plan, as required by the rule

5.5 Safety Analysis Group

Provides Subject-matter Expert assistance in determining rule applicability to facilities and activities

5.6 Standards Program Group

Assists the Price-Anderson Program Manager, the responsible organization, and the affected organizations, as requested, with the implementation of this procedure and 1-Q05-ADM-02 26

6. INSTRUCTIONS—RULES RECEIVED FOR COMMENTS

As each rule is published by DOE in the Federal Register for notice and comment, the affected organizations will be given the opportunity to review and comment on the proposed rule. This will be coordinated by Performance Assurance.

Price-Anderson Program Manager

- [1] Identify rules published by DOE in the Federal Register for notice and comment
- [2] Provide the Responsible Organization with a copy of the proposed rule and instructions for providing comments

Responsible Organization

- [3] Determine other affected organizations, in conjunction with the Standards Program group
- [4] Provide other affected organizations with a copy of the proposed rule and instructions

Affected Organizations

- [5] Review proposed rule and provide comments as specified in the instructions

Responsible Organization

- [6] Compile comments and provide to Price-Anderson Program Manager

Price-Anderson Program Manager

- [7] Coordinate comments with General Counsel and others, as appropriate
- [8] Transmit comments to DOE

7. INSTRUCTIONS—IMMEDIATE IMPLEMENTATION

Some of the rules may not require an implementation plan to be submitted, but rather become effective after being issued. When this is the case, the Responsible or Lead Technical Organization will be notified by the Price-Anderson Program Manager. Other affected organizations will also be notified. The status of compliance will be determined and processed in accordance with the applicable portions of 1-Q05-ADM-02.26.

Price-Anderson Program Manager

- [1] Identify rules published by DOE in the Federal Register or Code of Federal Regulations for which there is no regulatory provision for an implementation plan or schedule.
- [2] Provide a copy of the rule to the responsible organization.

Responsible Organization

- [3] Determine other affected organizations in conjunction with the Standards Program group.
- [4] Provide a copy of the rule to each affected organization.

Affected Organizations

- [5] Confirm the applicability of the rule to the organization facilities and activities.
- [6] IF the rule is applicable,
THEN perform compliance assessment in accordance with 1-Q05-ADM-02.26.

NOTE *10 CFR 820, Subpart E, Exemption Relief, addresses temporary or permanent exemptions for situations that are not in compliance with the rule.*

- [7] Process noncompliances in accordance with 1-Q05-ADM-02.26.

7. INSTRUCTIONS—IMMEDIATE IMPLEMENTATION (continued)

NOTE *If not in compliance, then the provision in 10 CFR 820 65 is used It states "With respect to a DOE Nuclear Safety Requirement for which there is no regulatory provision for an implementation plan or schedule, an exemption may be granted to establish an implementation plan which reasonably demonstrates that full compliance with the requirement will be achieved within two years of the effective date of the requirement without a determination of special circumstances under 820 62(d) "*

[8] **IF** it is determined that full compliance is not reasonably achievable,
THEN seek a permanent exemption in accordance with 10 CFR 820 62

[9] Keep the Responsible Organization, the Standards Program group, and the Price-Anderson Program Manager informed of the status of compliance assessments and noncompliances

**8. INSTRUCTIONS—RULES REQUIRING SUBMITTAL OF AN
IMPLEMENTATION PLAN**

These rules are handled the same way as other new or revised standards in accordance with 1-Q05-ADM-02 26. Additionally, they require an implementation plan to be prepared and submitted to DOE in accordance with Section 9, Preparation of Implementation Plans

Price-Anderson Program Manager

- [1] Identify the Lead Technical organization (the Responsible Organization) for the subject rule
- [2] Provide the Responsible Organization and the Standards Program group with a copy of the rule

Standards Program Group, Responsible Organization, and Affected Organizations

- [3] Follow procedure 1-Q05-ADM-02 26 for the following
 - Determination of applicability
 - Compliance Assessment, including
 - Assignment of responsibility
 - Changing the assignment
 - Performing the assessment
 - Processing the Compliance Summary Report form

Responsible Organization

- [4] IF noncompliance is identified,
THEN prepare an exemption request in accordance with
procedure 1-Q05-ADM-02 26.
- [5] Prepare the implementation plan in accordance with Section 9, using
information provided by affected organizations
 - [A] Keep DOE counterparts informed regarding the implementation plan
development
 - [B] Work to resolve expressed DOE concerns

**8. INSTRUCTIONS—RULES REQUIRING SUBMITTAL OF AN
IMPLEMENTATION PLAN (continued)**

- [6] **WHEN** the implementation plan is acceptable to the responsible organization,
THEN obtain review and approval in accordance with Section 10.

9. INSTRUCTIONS—PREPARATION OF IMPLEMENTATION PLANS

This section of the procedure is based on DOE Standard DOE-STD-1082-94

The DOE Standard does not specify the format for the implementation plan, to permit the implementing organizations to take advantage of pre-existing documents. When making the transition from Nuclear Safety Orders to Nuclear Safety Rules, DOE expects the implementing organizations to use the implementation plans and procedures developed and approved for the Orders as a basis for the rule implementation plan. Typically, these plans are revised or supplemented only as necessary to reflect any new requirements in the rules or additional information requested by DOE.

The organization that will prepare the implementation plan and the DOE organizations responsible for review and approval of the plan need to have a shared vision of what should be in the completed plan before submission of the plan to DOE. In order to gain DOE input and to increase the chances of developing a successful implementation plan, early and continual dialogue between the implementing organization and DOE is recommended.

9.1 Implementation Plan Content

NOTE *DOE-STD-1082-94 contains explanations of the information DOE is looking for in an implementation plan. Those involved in the development of the implementation plan may find it beneficial to refer to the standard.*

Responsible Organization

- [1] Include the following, as applicable, in each implementation plan
- Summary of Implementation Plan
 - General Information
 - Applicability of the Rule
 - Implementation Guides/Technical Standards Used to Meet the Rule
 - Baseline Compliance Assessment (Compliance Summary Report)
 - Additional Activities Necessary to Meet the Rule
 - Tasks and Schedule
 - Exemptions

9.1 Implementation Plan Content (continued)

- Compensatory Measures
- Tracking Implementation Tasks
- Use of Graded Approach
- Resource Assessment (Additional Life Cycle Costs to Implement the Rule)
- Prioritization Process Used to Integrate Additional Workload

[2] IF DOE issues special instructions regarding the preparation of implementation plans for a specific rule that deviate from DOE-STD-1082-94, THEN follow the special instructions

9.2 Summary of the Implementation Plan

This part of the implementation plan is written after the balance of the plan has been prepared. This section of the plan summarizes the more significant information contained in the plan.

Responsible Organization

- [1] Provide the following information, as a minimum, in the summary
- Any requests for exemptions contained in the plan
 - The total additional funding required to meet the requirements of the plan and the expected sources of funding by fiscal year
 - Any significant new programs or activities needed to meet the requirements
 - Any significant impacts to other programs or activities not included in the plan
 - Any constraints to implementing the plan
 - Those areas where there is currently full compliance with the requirements

9.3 General Information

This section of the implementation plan contains general information requested by DOE

Responsible Organization

- [1] Identify the subject DOE rule addressed in the plan
- [2] Identify whether the plan is the initial submittal or a revision
- [3] Identify the facilities or activities, missions, and contractors involved
- [4] Discuss briefly the content and format of the plan

9.4 Applicability of the Rule

DOE nuclear safety requirements documents state the types of facilities and activities to which they apply. The third section of the implementation plan identifies the applicability of the rule.

NOTE *Applicability statements are not to be used to provide relief where the requirements are clearly stated to be applicable in the DOE requirements document. Relief from requirements that are clearly applicable can only be granted by an approved exemption.*

Responsible Organization

- [1] Identify the specific facilities or activities covered by the implementation plan
- [2] **IF** the rule or any part of the rule is determined to be not applicable, **THEN** clearly document the basis for the determination
- [3] Identify any requirements that are only partially applicable, the limits of applicability, and the reasons for the limitation

9.4 Applicability of the Rule (continued)

- [4] Identify clearly which of the following three categories applies to each requirement for a given facility, site, or activity
- The requirement is applicable and the implementation plan defines the actions and schedules for compliance
 - The requirement is applicable and an exemption is being requested.
 - The requirement is not applicable for the reasons documented in the implementation plan

9.5 Implementation Guides and Technical Standards

DOE encourages the use of implementation guides and technical standards as the means to meet DOE requirements documents. Methods and guidance from implementation guides and technical standards are considered when developing the implementation plans; however, alternative methods that achieve comparable results are acceptable to DOE.

When implementation guides or technical standards are used, this section indicates whether they are adopted in their entirety or adopted with exceptions. Any exceptions to the guides or technical standards are noted. Methodologies and guidance provided in implementation guides and technical standards are acceptable to DOE when adopted in their entirety. Methodologies and guidance that are adopted with exceptions will be reviewed by DOE on a case-by-case basis.

NOTE *Commitments in implementation plans to meet all or parts of implementation guides and technical standards are enforceable as part of the implementation plan.*

Responsible Organization

- [1] IF implementation guides or technical standards are adopted as all or part of the implementation plan,
THEN list the adopted guides and technical standards by including a list in the implementation plan, or by incorporating a list by reference.
- [2] Document in the implementation plan exceptions to the implementation guides and technical standards.

9.6 Baseline Compliance Assessment (Compliance Summary Report)

The implementing organizations determine the extent to which the requirements are already met. This effort is generally referred to as establishing the compliance baseline. This is accomplished in accordance with 1-Q05-ADM-02.26 and is documented on the Compliance Summary Report (CSR) form. The CSR documents both compliance and noncompliance.

Responsible Organization

- [1] Extract the baseline compliance information from the CSRs, and include in the implementation plan.
- [2] Provide a paragraph in the implementation plan stating that the baseline compliance assessment is documented on the CSR.

9.7 Additional Activities Necessary to Meet the Rule

This section is provided to identify the additional activities that are necessary to meet the requirements. The combination of the baseline activities and the additional activities identify actions necessary to achieve full compliance with the rule. In general, the level of detail of the activities listed in the implementation plan define the commitments for implementation and do not include the day-to-day activities reflected in facility-specific procedures.

Responsible Organization

- [1] Identify the additional activities in this section of the implementation plan that are necessary to achieve full compliance with the requirements.

9.8 Tasks and Schedule

This section identifies proposed tasks and schedule developed in accordance with the two preceding sections and the prioritization process discussed in Section 9.14, Prioritization.

Responsible Organization

- [1] Identify under this section heading the tasks and schedules that are necessary to meet the requirements of the rule.

9.9 Exemptions

Exemptions are requested whenever relief is sought from an applicable DOE requirement. The provisions for requesting and granting exemptions to DOE rules are stated in 10 CFR 820, Subpart E, Exemption Relief.

Responsible Organization

- [1] Identify any exemptions that have been approved or are being requested.
- [2] Provide a statement under this section heading if exemptions are also discussed in other sections of the implementation plan.
- [3] Attach the proposed exemption(s) as an appendix to the implementation plan

9.10 Compensatory Measures

Compensatory measures describe the actions taken to provide adequate protection of individuals and the environment prior to full implementation

Responsible Organization

- [1] Describe all compensatory measures that will be adopted prior to full implementation of the requirements
- [2] Link the compensatory measures to the rule requirement that is not being met
- [3] Provide a statement under this section heading if compensatory measures are also discussed in other sections of the implementation plan

9.11 Tracking Implementation Tasks

The implementation plan documents commitments with regard to meeting the nuclear safety requirements. The Plant Action Tracking System (PATs) will be used to ensure that baseline and additional activity milestones (tasks and schedule) described in the implementation plan are met on schedule. Procedure 1-Q05-ADM-02 26, Section 8 5, Tracking RFAs and STCs, and Section 8 6, Implementation and Closures, provide additional information

9.11 Tracking Implementation Tasks (continued)

Responsible Organization

- [1] Obtain a brief description of PATS from Commitments Management and include in the implementation plan
- [2] Provide a statement under this section heading that baseline and additional activity milestones (tasks and schedule) described in the implementation plan are being submitted to PATS for tracking and documentation of closure
- [3] Track implementation tasks and close in accordance with 1-P04-ADM-16 00, Sitewide Commitments Management Process.

9.12 Use of Graded Approach

The complete set of activities necessary to meet the nuclear safety requirements, as well as the level of depth, rigor, and thoroughness in applying them to a given facility, may be determined by applying a graded approach. The graded approach is defined in 10 CFR 830.3, Definitions, and discussed in 10 CFR 830.7, Graded Approach.

When a DOE requirements document is developed, DOE may include information in the safety or implementation guide to help the responsible organization in grading. However, the responsible organization uses its best judgment in the determination of the appropriate activities for full implementation of a requirement. The responsible organization proposes the method for applying a graded approach to the particular facilities or activities in the proposed programs or plans submitted to DOE. When approved, those activities become the basis for assessment and enforcement.

Responsible Organization

- [1] Document the basis for selecting the action pursuant to the graded approach whenever a graded approach is used.

9.13 Resource Assessment

The implementation plan provides an estimate of the additional life-cycle costs to comply with the nuclear safety requirements. The goals of this element of the implementation plan are as follows:

- To communicate the expected new costs of implementation to DOE management for the purposes of budget planning and prioritization
- To identify the need to explore more cost-effective means of achieving compliance
- To identify cases where exemptions should be requested on the basis of insufficient benefit versus the expected implementation costs

Identification of required resources also serves to initiate dialogue regarding cost modifications and activities to the available resources.

The use of more cost-effective methods of compliance, or exemptions are considered whenever the resource expenditures necessary to meet a requirement are not commensurate with the expected safety improvements.

Responsible Organization

- [1] Provide an estimate of the additional life-cycle costs to implement the nuclear safety requirements
- [2] Identify the expected sources of funding for the proposed activities

9.14 Prioritization

A discussion of the prioritization process used to integrate the proposed activities into a facility or site schedule of activities is included.

The prioritization process considers available information from safety analyses and other sources and gives primary attention to controlling and reducing risks to the public, the environment, and the workers to an acceptable level. It considers other factors, such as mission needs, outage schedules, and external regulations.

9.14 Prioritization (continued)

Responsible Organization

- [1] Provide in this section a discussion of the process used to prioritize and integrate the proposed activities into the overall schedule of site or facility activities

10. INSTRUCTIONS—IMPLEMENTATION PLAN REVIEW AND APPROVAL

The technical and factual accuracy of the implementation plan and the status of compliance is the responsibility of the generating organizations. According to 10 CFR 820.11, Information Requirements, any information pertaining to a nuclear activity provided to DOE shall be complete and accurate in all material respects. Any violation of the information requirements will subject the violator to civil penalties.

10.1 Technical Review

The responsible organization, affected organizations, and the General Counsel participate in the review of the implementation plan for adequacy, technical content, and accuracy.

Responsible Organization

- [1] **WHEN** the draft implementation plan is acceptable to the responsible organization,
THEN determine the organizations with input or implementation responsibility that should review the plan for technical content and accuracy.
- [2] Distribute the draft implementation plan for parallel review.

Affected Organizations

- [3] Coordinate review of the implementation plan by knowledgeable personnel within the respective affected organization.
- [4] Review for technical content and accuracy.
- [5] Document comments on Review Comment Sheets in accordance with 1-A03-PPG-004, Procedure Edit, Review, and Comment.
- [6] Return the Review Comment Sheets to the responsible organization.

General Counsel

- [7] Review implementation plans for consistency with legal requirements and commitments.

10.1 Technical Review (continued)

Responsible Organization

- [8] Disposition comments, as appropriate
- [9] Coordinate acceptance of the comment dispositions.
- [10] Revise the implementation plan to incorporate comment resolution.

10.2 Implementation Plan Approval

Implementations plans are submitted to the Standards Board for review. The Standards Board provides an opportunity for final senior management review prior to submission to DOE

Responsible Organization

- [1] **WHEN** a draft implementation plan is acceptable to the responsible organization,
THEN schedule a meeting with the Standards Board
- [2] Provide a copy of the draft implementation plan to the Standards Board Chair at least one week prior to the scheduled board meeting

Standards Board

- [3] Attend meeting prepared to discuss the implementation plan
- [4] Provide comments to the responsible organization

Responsible Organization

- [5] Resolve Standards Board comments to the satisfaction of the board

Standards Board

- [6] **WHEN** the implementation plan is acceptable to the Standards Board,
THEN sign the implementation plan

10.2 Implementation Plan Approval (continued)

Price-Anderson Program Manager

- [7] Submit the implementation plan to DOE for approval

- [8] Provide a copy of the implementation plan to Commitments Management for entry into PATS

**11. INSTRUCTIONS—IF AN IMPLEMENTATION PLAN IS REJECTED BY
DOE**

DOE has stated that they will endeavor to resolve with the responsible organization any concerns identified by DOE during the review process

DOE has the option of approving the implementation plan, imposing a revised plan, or rejecting the plan

Responsible Organization

- [1] IF the implementation plan is rejected,
THEN work with DOE and the affected organizations to resolve DOE concerns and develop a revised, acceptable implementation plan.

12. INSTRUCTIONS—REVISIONS

Responsible Organization

- [1] Revise EXs in accordance with 1-Q05-ADM-02.26, Section 8.4, Revisions.
- [2] Provide revisions to the Price-Anderson Program Manager.

Price-Anderson Program Manager

- [3] Transmit revisions to DOE.

13. INSTRUCTIONS—ENFORCEMENT

Enforcement under the Price-Anderson Amendments Act will be handled on a case-by-case basis

Price-Anderson Program Manager

- [1] Confirm that General Counsel and the responsible organization have a copy of the enforcement correspondence
- [2] Provide a copy of the enforcement correspondence, as appropriate, to affected organizations
- [3] Provide coordination of and assistance with the resolution of enforcement actions

Responsible Organization

- [4] Prepare, in conjunction with the Price-Anderson Program Manager and General Counsel, the proposed response to the notice of violation
- [5] Provide proposed response to General Counsel and to the Price-Anderson Program Manager

Price-Anderson Program Manager, General Counsel, and Responsible Organization

- [6] Work together to finalize the response
- [7] Review the response for accuracy and completeness
- [8] Obtain concurrence and approval of the response, as appropriate
- [9] Transmit the response to DOE

14. RECORDS

The Implementation Plan generated by this procedure is a Quality Assurance record. All records are considered permanent until a retention period has been established jointly with Records Management (RM)

Responsible Organization

- [1] Maintain the Implementation Plan in accordance with 1-77000-RM-001, Records Management Guidance for Records Sources, until turnover to Records Management.

15. REFERENCES

DOE Standard 1027-92, Hazard Categorization and Accident Analysis Techniques for Compliance with DOE Order 5480 23, Nuclear Safety Analysis Reports

DOE Standard 1082-94, Preparation, Review, and Approval of Implementation Plans for Nuclear Safety Requirements

Safety Analysis Program Implementation Plan

Site Safety Analysis Phase I Report, Site Hazards Analysis and Facility Categorization (NSTR-016-94)

Standards Program Manual

1-A03-PPG-004, Procedure Edit, Review, and Comment

1-P04-ADM-16 00, Sitewide Commitments Management Process

1-Q05-ADM-02 26, Standards Identification, Assessment, and Noncompliance Process

1-77000-RM-001, Records Management Guidance for Records Sources

15. REFERENCES (continued)

10 CFR 820, Procedural Rules for DOE Nuclear Activities

10 CFR 830, Nuclear Safety Management

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**BUDGET GUIDANCE FOR IMPLEMENTATION
OF NUCLEAR SAFETY REQUIREMENTS**

The DOE is in the process of issuing rules which will be enforceable under 10 CFR 820 and which will replace equivalent existing DOE Orders. Most of these rules will require Implementation Plans to be submitted. A lead organization has been designated for each of the first rules that will be issued. These designated organizations will be responsible for obtaining the necessary information from all organizations affected by the respective rules, preparing the plan for submittal to the DOE, and working with the Price-Anderson Program Manager to interface with DOE and ensure consistency among the various implementation plans.

Funding and prioritization of the activities associated with both the development of the implementation plans and the efforts involved in the actual implementation must be established and included in budget requests. Each organization with lead responsibility for a given rule is to fund all related work packages for both internal and external activities, i.e., funding for activities under the organization's direct responsibility and for activities performed by other organizations in support of developing the implementation plan.

The effort involved in generating implementation plans may be significant, depending on the extent of existing compliance and documentation. While difficult to quantify the costs for preparing the various implementation plans due to their individual differences, experience to date suggests that it may require 5-6 full-time equivalent (FTE) employees, or approximately \$500,000, for each implementation plan. This is based on a pilot program for implementation of the Maintenance Management and Quality Assurance rules, as well as expenditures to date on implementation of the Quality Assurance and Occupational Radiation Protection rules.

For both the Maintenance and Quality Assurance rules, implementation plans existed under the associated DOE Orders. For other forthcoming rules in areas where no corresponding order implementation plan exists, the efforts involved in developing a rule implementation plan could exceed these estimates. Conversely, the experience to date has been associated with rules having a broad scope and affecting most organizations. Many of the forthcoming rules have a narrower scope or do not require the participation of all organizations. Therefore, for budgeting purposes, an estimate of 4 FTE for development of each implementation plan is appropriate.

It should be noted that significant additional efforts, and resources, will be required for actual implementation. For example, 10 CFR 830.110 requires upgraded Safety Analysis Reports (SARs) for each facility. It is estimated that 4 FTE will be required to develop a plan and schedule for upgrading the SARs, and that the actual work to upgrade the SARs will be in addition to this.

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Estimated resources are summarized in Table 1-1, Estimated Resources for Development of DOE Rule Implementation Plans

Table 1-1, ESTIMATED RESOURCES FOR DEVELOPMENT OF
DOE RULE IMPLEMENTATION PLANS

Lead Organization	Rule No. (10 CFR)	Title	Budget
Engineering and Safety Services	830 110	Safety Analysis Reports	4 FTE
	830 112	Unreviewed Safety Questions	*
	830 320	Technical Safety Requirements	4-5 FTE
	834	Radiation Protection of the Public and the Environment	4-5 FTE
Organizational Effectiveness	830 310	Conduct of Operations	4 FTE
	830 330	Training and Certification	4 FTE
Administrative Services	830 122	Defect Identification and Reporting	*
Support Services	830 340	Maintenance Management	4 FTE
	830.350	Occurrence Reporting	4-5 FTE

* May seek an exemption to show compliance in 2 years